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Attorneys for Plaintiffs
Virginia Pellegrini and
Virginia Pellegrini, Trustee of the
Mario and Virginia E. Pellegrini Trust

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Virginia Pellegrini, Trustee of the Mario J.
and Virginia E. Pellegrini Trust, and
Virginia Pellegrini, and individual,

Plaintiff,

vs.

Technichem, Inc., a California corporation,
et al., et al.,

Defendants.

Case no. 07-CV-02497-CRB

**NOTICE OF JOINT MOTION TO STAY
PROCEEDINGS**

Hearing Date: July 26, 2008

Time: 10:00 a.m.

Court: Hon. Charles Brewer
Courtroom 8

Trial date: October 6, 2008

To the parties and the Court:

Please take notice that on July 26, 2008 at 10:00 a.m. in Courtroom 8 of the above Court, the Hon. Charles Brewer presiding, Virginia Pellegrini, individually and in her capacity as trustee, and defendants Technichem, Inc. and affiliated defendants Mark J. Ng and Stephen S. Tung, who together are all of the parties who have appeared in this case, will present their joint motion for an order staying

1 these proceedings pending litigation of substantially similar issues in a pending state court action.

2 The motion will be based on this notice, the memorandum of points and authorities and
3 declaration of Benjamin H. Ballard filed herewith, pertinent documents in the Court's file and other
4 evidence the Court might properly consider in connection with the motion.

5 Date: June 19, 2008

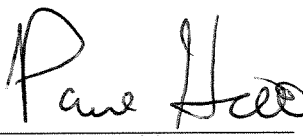
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7 Ballard Law Office
8 Lamphere Law Office

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10 By: Benjamin H. Ballard

11 Attorneys for Plaintiffs

Gordon & Rees LLP

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13 By: Paul A. Henreid

14 Attorneys for Defendants Technichem, Inc.,
15 Mark J. Ng and Stephen S. Tung

PROOF OF SERVICE

I, Benjamin H. Ballard, hereby declare:

I am employed in the County of Marin, State of California; I am over the age of eighteen and not a party to the within action; my business address is 1606 Juanita Lane, Ste. C, Tiburon CA 94920.

On the date listed below, I served the following document(s):

NOTICE OF MOTION IN TO STAY PROCEEDINGS, RELATED MEMORANDUM
OF POINTS AND AUTHORITIES, DECLARATION OF BENJAMIN H. BALLARD
AND PROPOSED ORDER

on all the parties in this action and/or the following persons at the addresses shown:

Brian M. Ledger
Paul A. Henreid
Gordon & Rees LLP
101 West Broadway
Suite 1600
San Diego, CA 92101
Attorneys for Defendants Technichem Inc.,
Mark J. Ng/ and Stephen S. Tung

x (e-filing) I electronically filed the documents with the United States District Court, Northern District of California through CM/ECF (E-file).

(personal service): I caused envelopes addressed to them containing the documents to be delivered by hand to them.

(overnight delivery) I caused envelopes addressed to them containing the documents to be deposited at Tiburon, California with shipping charges prepaid for overnight delivery by Federal Express or other, equivalent overnight delivery service.

(mail) I caused envelopes addressed to them to be deposited with postage prepaid in the U.S. Mail at Tiburon, California.

(email) I emailed the documents to them at the email addresses shown.

(fax) I faxed the documents to them at the fax numbers shown

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on at Tiburon, California on June 19, 2008

/s/ Benjamin H. Ballard